

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

LG DISPLAY CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS
CORPORATION, et al.

Defendants.

Civil Action No. 06-726 (JJF)

Civil Action No. 07-357 (JJF)

CONSOLIDATED CASES

**PLAINTIFF LG DISPLAY CO. LTD.'S MOTION TO COMPEL CHI MEI
OPTOELECTRONICS CORPORATION TO PROVIDE DISCOVERY**

Plaintiff LG Display Co., Ltd. ("LG Display") respectfully moves this Court to compel Chi Mei Optoelectronics Corporation ("CMO") to provide discovery in response to LG Display's requests for production seeking technical information concerning all of CMO's relevant products, including product design specifications, manufacturing process documents, and information concerning CMO's fabrications and plans; worldwide sales summaries; information relevant to inducement; and reports to shareholders, shareholder agreements, offering circulars, and other stock related documents. The factual and legal support for this motion are set forth in the accompanying opening brief, which has been simultaneously filed and served with this motion.

August 12, 2008

BAYARD P.A.

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[PROPOSED] ORDER

AND NOW, the Court, this ____ day of _____, 2008, upon consideration of Plaintiff LG Display Co., Ltd.'s ("LG Display's") Motion To Compel Chi Mei Optoelectronics Corporation ("CMO") To Provide Discovery, does hereby ORDER that CMO shall produce by the ____ day of _____, 2008:

A. Technical information concerning CMO's relevant liquid crystal display ("LCD") products, including:

1. Product designs documents and specifications for the TFT substrate that disclose, for example, the composition and thickness of the various layers of the TFT array for each CMO product. (LG Display's Document Requests 32-34, 37.)
2. Documents that include the manufacturing recipes for CMO's gate deposition process and gate etching process (i.e. documents that describe the manufacturing conditions for those processes). (LG Display's Document Requests 32, 37(b).)
3. Documents concerning CMO's fabrication equipment and plants, including, for example, all floor layouts for each fabrication. (LG Display's Document Requests 32, 37(b).)

B. Sales summaries showing all sales and including customer name, sales date, ship to, bill to, item, quantity, currency, USD amount, OEM maker, brand, and final destination for all CMO products sold worldwide and to the United States since December 1, 2000. (LG Display's Document Requests 4, 6, 7, 8, 11.)

C. Documents concerning manufacturing costs and yields for CMO products and fabrication plants. (LG Display's Document Requests 71.)

D. Documents concerning CMO's activities and communications relevant to inducement, including documents concerning, for example: (LG Display's Document Requests 11-31, 74.)

1. selling or supplying infringing products for resale;
2. communications and presentations to promote CMO products;
3. knowledge that customers will import and sell products in the U.S.;
4. authorized return and repair centers in the U.S. for CMO panels;
5. the provision of technical support in the U.S.;
6. shipment of products to U.S. customers to fix technical problems;
7. on-site technical presentations in the U.S.;
8. adjustments in manufacturing process based on customer concerns;
9. coordination of shipping to and for the U.S. market; and
10. the making of products in accordance with U.S. laws and regulations.

E. CMO's reports to shareholders, shareholder agreements, offering circulars, and other stock related documents. (LG Display's Document Requests 81-82.)

CMO also shall re-produce in an appropriate and usable format, by the ____ day of _____, 2008, any files that are corrupted, cannot be opened, or cannot be processed without non-standard software or hardware.

This ____ day of _____, 2008.

The Honorable Joseph J. Farnan, Jr.

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on August 12, 2008, he served the foregoing documents by email and by hand upon the following counsel:

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